

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

AARON SIEGEL, JASON COOK,
JOSEPH DELUCA, NICOLE CUOZZO,
TIMOTHY VARGA, CHRISTOPHER
STAMOS, KIM HENRY, AND
ASSOCIATION OF NEW JERSEY
RIFLE AND PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official
capacity as Attorney General of the State
of New Jersey; and PATRICK
CALLAHAN, in his official capacity as
Superintendent of the New Jersey State
Police,

Defendants.

No. 22-CV-7463 (RMB) (AMD)

RONALD KOONS; NICHOLAS
GAUDIO; JEFFREY M. MULLER;
SECOND AMENDMENT
FOUNDATION; FIREARMS POLICY
COALITION, INC.; COALITION OF
NEW JERSEY FIREARM OWNERS; and
NEW JERSEY SECOND AMENDMENT
SOCIETY,
Plaintiffs,

v.

WILLIAM REYNOLDS in his official
capacity as the Prosecutor of Atlantic
County, New Jersey; GRACE C.

No. 22-CV-7463 (RMB) (AMD)

MACAULAY in her official capacity as the Prosecutor of Camden County, New Jersey; ANNEMARIE TAGGART in her official capacity as the Prosecutor of Sussex County, New Jersey; MATTHEW J. PLATKIN, in his official capacity as Attorney General of the State of New Jersey; and PATRICK CALLAHAN, in his official capacity as Superintendent of the New Jersey State Police,
Defendants.

CERTIFICATION OF ROBIN MADDEN

ROBIN MADDEN, of full age, upon her oath certifies and says:

1. I am the Chief of Operations of the Assistant Commissioner's Program Area of State Parks, Forests & Historic Sites (the "SPF&HS"), within the New Jersey Department of Environmental Protection ("NJDEP").
2. As the Chief of Operations for SPF&HS, I have personal knowledge of the material facts of this Certification.
3. Through the SPF&HS, NJDEP administers New Jersey's state park land.
4. As Chief of Operations, on behalf of the Assistant Commissioner, I oversee and provide guidance and direction to State Park Service management and personnel who handle the day-to-day operations of State Parks.

5. NJDEP has broad authority to manage State Parks for recreational purposes. N.J.S.A. 13:1B-5(a); N.J.S.A. 13:1L-9; N.J.S.A. 13:1B-15.101(a); N.J.S.A. 13:1B-15.101(g); N.J.S.A. 28:1-4.

6. In furtherance of its statutory directives, NJDEP has promulgated the State Park Service Administrative Code, N.J.A.C. 7:2, which governs the use of these State Parks.

7. The State Park Service Administrative Code does not allow for the possession or discharge of a firearm or similar weapon in State Parks, unless for permitted recreational hunting in designated areas or other specifically approved firearm possession or use. N.J.A.C. 7:2-2.17, -2.18(a), -2.22(a). The DEP firearm restriction was adopted on October 7, 1991. NJDEP allows the State Park Police and Conservation Police or other law enforcement agencies to possess firearms in State Parks. Additionally, the State Park Service hosts historical re-enactments to commemorate significant historical battles and related events, utilizing antique weapons. Those weapons must be stored and used in compliance with a comprehensive black powder policy, last revised in 2014, in order to ensure the safety of both participants and spectators. Allowing the unrestricted carrying of firearms in State Parks would be contrary to NJDEP's policy of State Parks generally being gun free zones.

8. NJDEP set this policy because it is interested in preventing weapons from being carried in State Parks, as they are public places that vary in size and character through New Jersey, which attracts a wide range of visitors and hosts numerous large, crowded events.

9. New Jersey's residents, out-of-State tourists, and their families come to State Parks to enjoy recreating in the outdoors, staying overnight, visit historic sites and visitor centers, and/or attend events.

10. There are frequently many children present at State Parks.

11. During the summer months, State Parks are often filled for recreational activities, including swimming, picnicking and camping.

12. For instance, day use and overnight visitation numbers for fiscal year 2022 was over 17 million visitors. Many times are campsites are filled to capacity in some locations.

13. State Parks are also often locations for large events, ranging from marathons to charitable fundraisers to organized protests, where as many as tens of thousands of visitors may be in attendance.

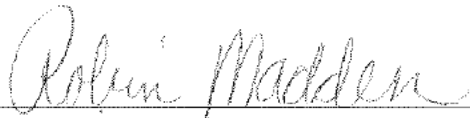
14. July 4th brings visitation to some of the highest numbers seen by the parks overall. Typically, visitation is in excess of 60,000 visitors across the State. The Veuve Clicquot Polo Classic, an annual staple event, will be returning

to Liberty State Park in 2023 with attendance expected to reach anywhere to 5,000-8,000 in excess of the daily visitation to the park.

15. State Park visitors may purchase and consume alcohol at State-approved and regulated vendors within State Parks. Some of these vendors include Special event caterers that host weddings and other celebrations.

16. It is important to NJDEP and the State that visitors to State Parks have a sense of security and peaceful enjoyment while visiting State Parks, in order to further the purpose of the State Park system and protect the public welfare.

The foregoing statements are true to the best of my knowledge, information, and belief. I am aware that, if any of the statements are willfully false, I may be subject to punishment.



ROBIN MADDEN
Chief of Operations
Assistant Commissioner's Program Area,
State Parks, Forests & Historic Sites
New Jersey Department of
Environmental Protection

Dated: 2/10/23